

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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NOEL JACKSON-GUZMAN,

Plaintiff,

10 CV 6353 (ALC) (JCF)

-against-

P.O. Brian Jay, Shield No. 29733, Individually,
and in his Official Capacity,

**DECLARATION OF
JON L. NORINSBERG, ESQ.**

Defendants.
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JON L. NORINSBERG, declares pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am the attorney of record for plaintiff Noel Jackson-Guzman. As such, I am familiar with the facts stated below and submit this Declaration to place on the record the relevant documents in support of Plaintiff's Memorandum of Law in Opposition to Defendant's Motion *in Limine*.
2. Attached as **Exhibit A** is a copy of the emergency room medical record from Harlem Hospital.
3. Attached as **Exhibit B** is a copy of the emergency record from NY Presbyterian Hospital.
4. Attached as **Exhibit C** is a copy of the March 23, 2009 note from Columbia Presbyterian Medical Clinic, documenting the possibility of right leg neuropathy.
5. Attached as **Exhibit D** is a copy of medical record of the EMG/NCV test from All Med Medical & Rehabilitation, confirming plaintiff's right leg neuropathy.
6. Attached as **Exhibit E** is a copy of the MRI report of plaintiff's knee, dated April 19, 2010, documenting the damage to the ligaments in plaintiff's right knee.

7. Attached as **Exhibit F** is a copy of the operative report for the surgery on plaintiff's knee on October 7, 2010.

8. Attached as **Exhibit G** is a copy of the substantiated CCRB complaint against P.O. Jay arising from an incident on August 8, 2010.

9. Attached as **Exhibit H** is a copy is a copy of the videotape of the Dominican Day Parade Incident involving P.O. Jay on August 8, 2010.

10. Attached as **Exhibit I** is a copy of Defendant's 4th Supplemental Initial Disclosures, identifying six potential "medical witnesses" who might be called at trial.

11. Attached as **Exhibit J** is a copy of plaintiff's letter to ACC Morgan Kunz enclosing subpoenas for the deposition of all "medical witnesses" identified by defense counsel.

12. Attached as **Exhibit K** is a copy of plaintiff's letter identifying Hamlet Santana as a potential witness to be called at trial.

Dated: New York, New York
November 4, 2013

Respectfully submitted,



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